EXHIBIT A

DOCUMENTS AND THINGS TO BE PRODUCED BY GARY SCHNEIDERMAN, Ph.D. REQUEST NO. 1:

All documents, things, reports, books, or other material provided to you in this action or upon which you rely as the basis for your opinions and conclusions in your Declaration, including but without limitation, all such documents which you, or others at your direction, have generated.

REQUEST NO. 2:

A current resume.

REQUEST NO. 3:

Any and all reports, writings, analyses and/or statements prepared by you in connection with your activities as a witness or declarant herein, and all drafts or earlier versions thereof.

REQUEST NO. 4:

All correspondence, including but without limitation, correspondence by electronic mail, between you and Plaintiffs' attorneys or other agents in connection with this action.

REQUEST NO. 5:

All notes or memoranda made by you in connection with your activities as a witness or declarant, or in connection with any assignment to form any opinions herein, including but without limitation, all notes of conversations with Plaintiffs' attorneys or other agents in connection with this action.

REQUEST NO. 6:

Any and all speeches, presentations, and/or articles you have authored or prepared, including but without limitation, those you have relied on and/or that relate to the subject matter of your Declaration filed in this action.

REQUEST NO. 7:

All documents relating to any testimony you have given, whether by deposition, trial or otherwise, in any proceeding at any time, including a transcript of any such testimony.

REQUEST NO. 8:

All documents provided to you by Plaintiffs' attorneys or other agents in connection with this action.

REQUEST NO. 9:

All instructional materials you prepared and/or utilized in connection with any courses and/or seminars you have taught, and/or lectures you have given, relating to the subject matters of your Declaration filed in this action.

REQUEST NO. 10:

All notes or outlines you prepared and/or utilized in connection with your teaching, lecturing, advising, counseling, or commenting on subject matters relating to your Declaration filed in this action.

REQUEST NO. 11:

All documents and things you considered or reviewed in the preparation of your Declaration in this action.

REQUEST NO. 12:

All documents relating to all licenses, assignments, technology transfer agreements, settlement agreements, or other agreements to which Plaintiffs are, were, or considered becoming a party to, since 1997, and that license or purport to license to any party the right to make, use, import, or sell any Stent product or the right to use any technology, intellectual property rights, know-how, or trade secrets relating to the design, manufacture, or use of Stents.

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Rep. Ana			X	Live
Hernandez				
Rep. Gene Wu			X	Live
Rep. Mary Ann Perez			X	Live
Rep. Chris		X		Live
Turner				
Sergio Mora			X	Live
Bobbie Garza-			X	Live
Hernandez				
Candace	Contact information provided in previous June 10,		X	Depo
Valenzuela	2022 Supplemental Disclosure of DOJ			
Rep. Todd	c/o State Defendants	X		Depo
Hunter				
Dr. Morgan J.	See Expert Disclosures	X		Live
Kousser				
Dr. Matt Barreto	See Expert Disclosures	X		Live
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As noted above, MALC Plaintiffs reserve the right to call any witness identified on any other parties' witness list as a potential witness and, thus, each witness should be properly characterized as a "may call" witness. To the extent there are witnesses disclosed on other witness lists that MALC will definitively call that are not otherwise listed above, MALC will disclose those witnesses when it files its weekly witness lists pursuant to the Court's March 19, 2025 Scheduling Pre-Trial Scheduling Order.

an identification of each document or other exhibit, including summaries of other evidence— (iii.) separately identifying those items the party expects to offer and those it may offer if the need arises.

RESPONSE: MALC's Preliminary Trial Exhibit List is set forth in **Exhibit A** attached hereto. MALC reserves the right to introduce in evidence any documents identified by Defendants or any other plaintiff in their Pre-Trial Disclosures and to introduce additional documents as rebuttal or impeachment evidence.

MALC's list of trial exhibits does not include demonstrative exhibits, which will be identified